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7 *Attorneys for Defendant,*

8 *KEY INSURANCE COMPANY*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

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12 ALEKA JACKSON, individually;

BETTY JACKSON, individually;

13 Plaintiffs,

14 vs.

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16 KEY INSURANCE COMPANY, a foreign
corporation d/b/a STORM LEGAL GROUP
17 and d/b/a DESERT RIDGE LEGAL GROUP;
DOES-V; and ROE CORPORATIONS VI
18 through X, inclusive,

19 Defendants.
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CASE NO.: 2:22-cv-01542-APG-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL
UNREDACTED DOCUMENTS AND
DEPOSITION TESTIMONY**

21 COMES NOW, Defendant KEY INSURANCE COMPANY, by and through their
22 counsel, JAMES P.C. SILVERSTRI, ESQ. and ALI R. IQBAL, ESQ. of PYATT SILVESTRI,
23 Plaintiffs ALEKA and BETTY JACKSON, by and through their counsel, CRAIG W.
24 DRUMMOND, ESQ., and JOSEPH A. TUTONE, ESQ. of DRUMMOND LAW FIRM, hereby
25 stipulate and agree that the time for Defendant's to file their Opposition to Plaintiff's Motion to
26 Compel Unredacted Documents and Deposition Testimony be extended as set forth herein.
27 Defendant's opposition is currently due September 2, 2024, which is a holiday (Labor Day). The
28 parties hereby stipulate that the due date for Defendant's Opposition be extended to September 9,

2024. The parties also stipulate that the time for Plaintiffs' Reply be extended to September 16, 2024.

REASONS FOR EXTENSION

This is a matter that involves complicated issues of both attorney-client privilege, as well as work product privilege, not solely matters that deal with general matters of discovery.

Defendant requires additional time to develop its arguments fully before their brief is filed. Defendant disclosed a supplemental privilege log, on August 22, 2024, which was in response to Plaintiffs' Motion to Compel. Defendants also assert confidential documents that are referenced in their opposition that need to be filed under a Motion to Seal along with their opposition. Since the deadline for Defendant's opposition falls on a holiday, Defendant seeks to ensure such is filed timely and complies with the existing protective order (Docket #39). This stipulation is made in good faith and not for the purpose of delay.

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1 This is the first extension of time requested for filing Defendant's Opposition to Plaintiffs
2 Motion to Compel, as well as for the Reply in Support of Plaintiffs Motion to Compel.

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4 Dated this 29th of August, 2024.

5 Dated this 29th of August, 2024.

Dated this 29th of August, 2024.

6
7 **PYATT SILVESTRI**

DRUMMOND LAW FIRM

8 /s/ Ali R. Iqbal, Esq.
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18 **ORDER**

19 IT IS SO ORDERED

20 DATED THIS 3rd day of September, 2024.

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United States Magistrate Judge